

EXHIBIT A

(Second Amended Rule 30(b)(6)
Notice of Deposition)

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
Case No. 20-CV-954-WO-JLW**

FARHAD AZIMA,

Plaintiff,

v.

NICHOLAS DEL ROSSO and VITAL
MANAGEMENT SERVICES, INC.,

Defendants.

**SECOND AMENDED NOTICE
OF RULE 30(b)(6)
DEPOSITION OF DEFENDANT
VITAL MANAGEMENT
SERVICES, INC.**

PLEASE TAKE NOTICE:

Pursuant to Rules 26 and 30 of the Federal Rules of Civil Procedure, that Plaintiff Farhad Azima, through counsel, amends its prior notice of deposition of Defendant Vital Management Services, Inc., to state that Plaintiff will take the deposition of Defendant Vital Management Services, Inc., at the offices of Womble Bond Dickinson (US) LLP, located at 555 Fayetteville Street, Suite 1100, Raleigh, North Carolina 27601, on June 8, 2023, commencing at 10:00 a.m. The deposition will continue day-to-day until completed.

The deposition shall be taken before a notary public or other officer authorized by law to administer oath and recorded by sound, remote video, and/or stenographic means. The deposition may also be videotaped. The deposition shall be taken for the purpose of securing and preserving testimony for the trial of this cause and for all other purposes allowable under the Federal Rules of Civil Procedure and the Federal Rules of Evidence.

This, the 15th day of May, 2023.

MILLER & CHEVALIER CHARTERED

/s/ Ian Herbert

Kirby D. Behre (*pro hac vice*)

Timothy P. O'Toole (*pro hac vice*)

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Counsel for Plaintiff

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
CASE NO. 20-CV-954-WO-JLW**

FARHAD AZIMA,

Plaintiff,

v.

NICHOLAS DEL ROSSO and
VITAL MANAGEMENT
SERVICES, INC.,

Defendants.

CERTIFICATE OF SERVICE

I hereby certify that I served this Second Amended Notice of Deposition
by email on the following counsel for Defendants on May 15, 2023:

Brandon S. Neuman, Esq.

Jeffrey M. Kelly, Esq.

Nathaniel J. Pencook, Esq.

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Counsel for Defendants

This, the 15th day of May, 2023.

MILLER & CHEVALIER CHARTERED

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Counsel for Plaintiff

Attachment A

Pursuant to Rule 30(b)(6), Vital Management Services, Inc. (“VMS”) is directed to designate one or more persons who will testify on its behalf and will be authorized to bind VMS with his, her, or their deposition testimony about all matters known or reasonably available to VMS, including information, sources of information, communications, and documents, related to the following topics:

1. All categories of documents requested in Plaintiff’s First and Second Request for Production, served to Defendant VMS on November 22, 2022 and January 24, 2023 respectively, as well as documents produced by Defendants Nicholas Del Rosso (“Del Rosso”; with VMS, “Defendants”) and VMS in response to Plaintiff’s discovery requests.

2. All payments included in Defendants’ bank records and related agreements, contracts, invoices, bills, requests for payment, or descriptions of work. In particular, the representative should be prepared to address all work performed by and all payments received from or sent to Dechert, Neil Gerrard, Jamie Buchanan, Buchanan Entities, Ras Al Khaimah Entities, Gravitas International FZE, CyberRoot, Aditya Jain, Jain Entities, Stuart Page, Stuart Page Entities, Amit Forlit, Forlit Entities, KARV Communications, Chris Swecker, Swecker Entities, Patrick Grayson,

Grayson + Co., GH Holding LLC, Grayson Entities, Paul Robinson, Robinson Entities, Yuri Koshkin, Koshkin Entities, Nick McCullough, McCullough Entities, Jean Renaud Fayol, Fayol Entities, Northern Technologies Inc., Gary Lowe, Shanahan Law Group, PLLC (and all prior iterations of this entity), Nelson Mullins Riley & Scarborough LLP, or any other Person that performed any work for or provided any services to Defendants, or for whom Defendants provided, attempted to provide, or offered to provide work or services, related to Plaintiff, Plaintiff's Associates, or any business or personal enterprise involving or related to Plaintiff.

3. Reports, memoranda, summaries, notes, or outlines related to Plaintiff, Plaintiff's Associates, or any personal or business enterprise involving or related to Plaintiff prepared for or by Del Rosso, VMS, or any of the individuals and entities identified in Topic No. 2, including but not limited to so-called "Project Updates," Project Beech reports, and action plans.

4. Acquisition of, retention of, or use of any documents that belonged or belong to Plaintiff.

5. Any attempt or effort (whether successful or unsuccessful) by Defendants or any Person to conceal the receipt, possession, transfer, or copying of any Document or Communication that belonged or belongs to Plaintiff including, but not limited to, any attempt by Defendants or any

Person to destroy or delete any such Documents or Communications.

6. Travel Records related to work performed by, at the direction of, or with the involvement of Del Rosso, VMS, or Defendants for or with the individuals and entities identified in Topic No. 2, including but not limited to travel to the Hotel Mooseegg, Switzerland; Cyprus; and meetings at Dechert's offices in New York and London.

7. Meetings with Amir Handjani during Plaintiff's trial in London in January and February 2020, including but not limited to Amir Handjani's meeting with Del Rosso at Del Rosso's son's flat.

8. The allegations in Defendants' Answer and Affirmative Defenses.

9. Pleadings, witness statements, and correspondence related to any litigation involving Plaintiff Azima.

10. The contents of Defendants' initial disclosures and any amended or supplemental disclosures.

11. The scope of projects undertaken by VMS, including but not limited to "Project Nariman," "Project Concorde," "Project Fallow," "Project N2," "Project San Remo," "Project Endeavor," "Wenger Project," "Project Eagle" or "Site Surveys Eagle," "Project ORM" or "Online Reputation Management," "Project Two," "Project N- Monaco," "India Project," and "Indonesia Project."

12. Entities VMS made payments to or received payments from, including but not limited to GH Holding LLC, Wheels Up Partners LLC, The White Crush Company LLC, Gravitas International FZE, Trident Group LLC, Karakoram Group, Mackworth Associates, Johannes Alexander Mueller, Elite Security Services, Rosenblatt Limited General, ADM Enterprises, Al Tamimi & Co., Phoenix Digital Services, Reditch Global Solutions, Stratzen, WhiteInk Global, B.J. Lyons, and Abousleiman & Partners.

13. Defendants' responses to interrogatories dated January 26, 2023.